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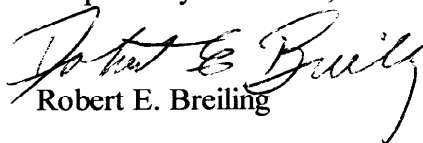
Docket Number 2001-10047-17

The proposed changes and additions to the FAR's outlined in Docket 2001-10047 will go a long way in removing many restrictions imposed on the FAR 135 operators and give the fractional operators the flexibility of FAR 91 which is justifiable as they are not for hire FAR 91 managed operators but comprised of multiple owner operated aircraft.

I particularly feel that the new landing requirements, weather criteria for approach and departure and more realistic night operation requirements will give new flexibility to 135 operators. This will not only allow them to operate to and from many other airports and runways heretofore not available to them but will undoubtedly aid in reducing traffic at some of the more congested airports.

Statistically, from an accident involvement standpoint, as pointed out in the introduction of the Federal Register, analysis of accidents involving FAR 135 turbine aircraft operators vs. those of FAR 91 turbine operators over the years has supported the fact that the more restrictive FAR 135 requirements had little effect on the accident involvement rate as the 135 operators accident rate was continuously worse than that of the 91 operators who comply with far less restrictive requirements

Respectfully submitted,


Robert E. Breiling

cc NBAA